UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 28 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7647 3392
RETURN RECEIPT REQUESTED

Mr. Anthony Klapac
Environmental, Health, and Safety Manager
Kaiser Aluminum
600 Kaiser Drive
Heath, Ohio 43056

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID: OHD004298089

Dear Mr. Klapac:

On August 16, 2016 a representative of the U.S. Environmental Protection Agency inspected the Kaiser Aluminum ("Kaiser") facility located in Heath, Ohio. As a large quantity generator of hazardous waste, Kaiser is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Kaiser's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Kaiser, on EPA's review of records, and on the inspector's observations, EPA has determined that Kaiser has unlawfully stored hazardous waste without a permit or interim status as a result of Kaiser's failure to comply with certain conditions for a permit exemption under Ohio Admin. Code § 3745-52-34(A)-(C) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Kaiser was out of compliance at the time of the inspection in the paragraph below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

At the time of the inspection, Kaiser was out of compliance with the following large quantity generator condition for a permit exemption:

Hazardous Waste Satellite Accumulation

Under Ohio Admin. Code § 3745-52-34(C)(1)(b) [40 C.F.R. § 262.34(c)(1)(ii)], a large quantity generator who stores waste in satellite accumulation containers must label those containers with either the words "Hazardous Waste," or other words identifying the contents of the container.

At the time of the inspection, Kaiser generated hazardous waste chemicals in their on-site laboratory. Two trays of individual bottles of wastes stored on a lab bench and, according to the laboratory technician, were discarded. The waste in the containers, according to the laboratory technician, would not be further used, and were hazardous. These containers were closed but were not each labeled to indicate their contents.

CONCLUSION

By failing to comply with the conditions for a permit exemption, above, Kaiser became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. Kaiser failed to apply for such a permit. Kaiser's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code §§ 3745-50-45(A) and 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring Kaiser to apply for an Ohio hazardous waste storage permit so long as it immediately establishes compliance with the condition for a permit exemption outlined in the paragraphs above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at whitney.brenda@epa.gov.

Sincerely,

for Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Andy Maneff, Ohio EPA (peter.maneff@epa.ohio.gov)
Mitch Mathews, OEPA (Mitchell.Mathews@epa.ohio.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	August 16, 2016
Facility Name:	Kaiser Aluminum
Facility Address:	600 Kaiser Drive Heath, Ohio 43056
EPA RCRA ID Number:	OHD004298089
Generator Status:	Large Quantity Generator
Facility Contact:	Anthony Klapac Environmental, Health, and Safety Manager
U.S. EPA RCRA Inspector:	Brenda Whitney - Environmental Engineer Land and Chemicals Division Resource Conservation and Recovery Act (RCRA) Branch Compliance Section 2

Prepared By: Brenda Whitney – Environmental Engineer — 9-23-16 Date

Approved By: Julie Morris – Chief, Compliance Section 2 — 9/26/16 Date

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "Inspection") of the Kaiser Aluminum facility ("Kaiser") located in Heath, Ohio, on August 16, 2016. This CEI was an evaluation of Kaiser's compliance with the RCRA hazardous waste regulations codified in the Ohio Administrative Code and the Code of Federal Regulations. The Facility has notified as a large quantity generator of hazardous waste generating more than 1,000 kilograms of hazardous waste in any month. Andy Maneff of the Ohio Environmental Protection Agency declined participation in this CEI.

Participants

Anthony Klapac – Environmental, Health, and Safety Manager	Kaiser
Christian Feisel – General Manager	Kaiser
Brenda Whitney – Environmental Engineer	U.S. EPA

Introduction

Upon arrival at Kaiser at 8:15a.m., EST, I signed in at the security office. The attendant contacted Mr. Klapac who drove to the security office to escort my vehicle to the business office. We proceeded to a conference room for an introductory meeting and were joined by Mr. Feisel. I delineated the purpose and logistics of the CEI, and I informed the representatives that I would be taking photographs during the CEI as needed. I provided the following compliance assistance documents: *Onsite Pollution Prevention Assistance (OEPA brochure)*; *P2 Technical Assistance Contacts;* and *U.S. EPA Small Business Resources*. We also discussed the procedures EPA uses for controlling confidential business information (CBI). The Kaiser representatives provided me with an overview of their manufacturing processes, waste generation sources, and waste management methods. I was then escorted on a walking tour of the facility before returning to the conference room to review records. Upon completion of the CEI, I held a closing conference with Messrs. Klapac and Feisel.

Site Description

The following information about Kaiser is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

Facility Background Information:

- The Department of Defense constructed this Facility in 1942 to aid in the war effort. The Facility was operated by Alcoa and subsequently bought by Kaiser in approximately 1945.
- Approximately 280 people are employed at this Facility.
- Kaiser controls twelve facilities and has one corporate headquarters.
- This Facility includes the following major areas:
  - Manufacturing space;
  - Casting
  - Annealing/Homogenizing Ovens
  - Extrusion
  - Milling
  - Storage
- Utility out-building;
- Carpentry out-building (mostly equipment storage);
- Laboratory out-building;
- Machine Shop/Maintenance area out-building;
- Offices associated with manufacturing space and out-buildings;

- Recirculating cooling water tower and lagoons (400,000 gallon total capacity);
- Fire water storage tank and pump house
- Total manufacturing space = 1.2 million square feet.
- Total property area = 144 acres.
- Employees work 24 hours a day, 7 days a week in rotating shifts.

Process Description:

Kaiser melts prime aluminum as well as remelts scrap aluminum alloy. Kaiser operates four 65,000-pound melters (numbered 3, 4, 5, and 6) and associated casting units. The specific alloy per the customer batch order is charged into the melter which heats the metal using natural gas. The molten metal is degassed with the addition of chlorine gas. The chlorine removes free hydrogen from the metal which reduces inclusions in the final cast. Hydrochloric acid fumes are vented out a stack to atmosphere. According to Mr. Klapac, Kaiser is not required to have emission control units for any process in the Facility and is working with Region 5 Air Division.

Dross is removed from the molten metal and is sent for recycling off-site. The molten aluminum is poured through a ring-shaped casting mold that is cooled with recirculated cooling water. As the metal cools, a table beneath the mold slowly descends for approximately 40 feet. The table moves at a rate dependent on the diameter of the ring in order to ensure proper cooling residence time. The result is a cast log of aluminum alloy up to approximately two feet in diameter and 40 feet long.

The log is processed through a heat cycle in ovens. Depending on the cycle times in the ovens, the log is either homogenized or annealed. Homogenization slows the surface cooling of the log to match the cooling of its center in order to prevent splitting. Annealing also homogenizes the log, but it has the added property of softening the metal for workability.

The finished log is tested ultrasonically to ensure that it has been homogenized prior to sale or further processing in the Facility.

Logs that continue through the plant for additional processing are first cut down into billet lengths. The billets are then heated in an induction oven and are extruded through a die. Dies can be made in various shapes as required by the customer. Essentially, the extrusion process makes longer, thinner cylindrical logs. However, the shaped logs may have rectangular cross sections or a customer-specific shape that cuts down on the processing that will have to be done at their plant.

Blooms, which are extrusions that have a six-inch square cross-sectional geometry, are further processed in the facility in the Rolling Mill in order to generate spools of rod (very thick wire). The operation of the mill is considered proprietary information by Kaiser, and shall not be discussed further in this narrative with the exception of wastes generated from the process.

Finished products at this site include logs, lengths of extruded aluminum, and spools of rod.

Raw materials:

- Prime aluminum – First run aluminum, not scrap, which comes to the Facility in stackable sows.
- Reclaimed aluminum from off-site dross recycling – Also arrives at the Facility in sows.
- Scrap aluminum pieces – Ordered in bulk from scrap dealer according to alloy composition. The scrap is spot checked with spectroscopy for constituent accuracy.
- Natural gas for the melters.
- Chlorine gas for degassing the molten metal in the melters.
- Sodium hydroxide for cleaning dies.
- High-flash mineral spirits for parts washers in maintenance and machining departments.
- Aqueous-based parts washer solvent for cleaning molds.
- Oil-based coolants for the rolling mill.

Waste Generation and Management:

- Caustic Bath – The dies for the extruder are cleaned in a dip tank of sodium hydroxide and water. The tank is emptied approximately three times a year. The waste hauler sucks out the free liquid into poly drums and the sludge into a metal open-top style drum. The waste is removed from the site that day. The waste is manifested as hazardous for low pH (D002) and the potential for lead (D008).
- Paint-related wastes from maintenance paint booth – Aerosol cans are punctured, and the residual is managed as hazardous waste for ignitability (D001). Liquid waste paint is poured into a drum and also managed as an ignitable hazardous waste.
- Refractory brick – brick from the melters may be removed during maintenance. Melter 3 is loaded with a lead-based alloy once a month. This brick on one occasion contained lead at 6.1 ppm (D008). Each time refractory from this melter is removed, it is segregated in a roll-off and sampled for analysis. When generated, this waste is stored indoors and under a tarp until the analytical results are received. Refractory from the other melters (4, 5, and 6) is comingled and managed as non-hazardous waste because lead-based alloys are not charged to these melters.
- Used oil and water – Coolant is used to lubricate the Rolling Mill. Water is added to the coolant. Waste coolant is pulled from the mill during maintenance and from spills into containment. This material is managed as used oil in two 9,000-gallon tanks. Water contaminated with used oil is generated in two outbuildings: utility and truck maintenance. The floor in these areas is washed down into a drain that collects into two in-ground concrete tanks behind the buildings. This water is also managed as used oil. Analytical data for oil collected at this facility shows total halogens under 1000ppm.
- Aluminum dross – Dross is collected from the melters and sent off-site to a recycler. The regenerated aluminum is returned to Kaiser in sows.
- Scrap aluminum – This material is mostly reused in-house to the greatest extent possible.
- Parts washers – Waste from all parts washers is managed as non-hazardous and is sent off-site on bills of lading through waste broker.
- Process recirculating cooling water – This water is for cooling the molds in the casting equipment. The water is continuously recirculated but must maintain a certain pH and

hardness level, in addition to other parameters. Kaiser operates a dissolved air floatation unit which generates some non-hazardous sludge from that unit. Kaiser is permitted to discharge up to 150,000 gallons of wastewater per day to the Heath POTW. The Facility discharges more than 1 million gallons of water a month. The permit includes lead limits of 0.31 ppm. They have had two exceedences in recent years: once for pH just over 9 and once for exceeding the 150,000-gallon discharge limit. Make-up water is pulled mostly from ground water, and less so from city water.

- Storm water is discharged to a nearby river under a storm water discharge permit.

Site Tour

The tour began at the two 9,000-gallon used oil tanks (See Appendix A: Photograph 1). Both tanks were insulated to prevent freezing, and were labeled as "Used Oil." The containment area around the tanks appeared to be in good condition. A truck loading pad adjacent to the containment is constructed to drain into the containment through weep holes.

I next did a cursory observation of the cooling towers, and the carpentry and wood storage barns. I observed one sump behind the carpentry shop and one behind the utility garage (See Appendix A: Photograph 2). These in-ground storage tanks contain wash water from powerwashing the floor in these areas. Kaiser manages these wash waters as used oil, though the oil is in de minimis quantities. The concrete vaults were mostly underground though the tops of the tanks could be observed.

The machine shop was next on the tour (See Appendix A: Photograph 3). I observed a can-puncturing device that was closed and labeled as "Hazardous Waste Paint." One additional 55-gallon drum in the area was for loose paint, such as what is left over from a paint can. This drum was also closed and labeled as "Hazardous Waste Paint." Both drums were vented through a carbon filter. Floor sweepings from the shop are collected in a hopper for metal recycling.

The inspection proceeded inside the Facility. I observed the following:

- The scalping lathe: This machine removes the top coat of the cast log in order to eliminate the inconsistent chemistry that rises to the surface.
- The billet saw: Logs of aluminum are cut into shorter lengths using this saw.
- Melters and casting pits: I could not approach these machines. However, I observed them from a safe distance as the facility representatives explained their operation and the generation of the waste dross and acid fumes from the equipment.
- Ovens: Kaiser has stationary ovens as well as mobile ovens for homogenization and annealing. Stationary ovens are less efficient than mobile units which can be moved and placed over the stack of logs that are to be treated. The cycle of heating and resting can be performed on several racks of logs at the same time. The logs that are processed in the stationary units occupy the oven for the entire cycle.
- Ultrasonic tester (Hilti Gun) – The logs are tested ultrasonically for uniformity. A drum of hazardous waste is located in this area. I did not observe it.
- Mold shop - Casting rings are created and maintained in this shop. An aqueous-based partswasher is used in this area. The spent solvent is managed as a nonhazardous waste.

- Incoming metals storage area - Incoming scrap metal comes in box trailers or gaylord boxes and is sorted by alloy type. Kaiser checks the incoming alloy to ensure that it meets specifications. Sows of incoming aluminum are stacked in columns. One of the stacks was piled well over the height of a man and was leaning precariously to one side.

We returned outside of the main Facility to observe more storage, out-buildings, water systems, and the laboratory.

- I observed several roll-off boxes near the incoming metals storage area. Some of the boxes included refractory brick in addition to other non-hazardous wastes (See Appendix A: Photograph 4). Mr. Klapac explained about the refractory from melter 3, which is assumed to be a hazardous waste. He stated that they keep refractory from melter 3 in a tarped container inside the building and that they mark it with a hazardous waste label and the words "Pending Analysis" until they receive the results for the waste.
- The water circulation system was next on the tour (See Appendix A: Photograph 5). I observed the circulation lagoons, though I did not see the DAF system. I also noticed a frac tank stationed at one corner of the property. I was told that this tank would be used to store excess rain water that would need to be stored in order for the facility to meet their 150,000-gallon daily discharge allowance.
- The laboratory is housed in a separate building from the main plant. Wet chemistry is conducted in this laboratory and small quantities of chemical wastes are generated. According to the laboratory technician, small quantities of chemicals such as hydrofluoric acid may be discarded down the sink. Mr. Klapac was not aware that the laboratory was discarded wastes in the drain and stated that they would look into a better practice for their Facility. Additionally, two trays of individual bottles of wastes were stored on a lab bench and would be discarded (See Appendix A: Photograph 7). The material in the containers, according to the laboratory technician, would not be further used, and were hazardous wastes. These containers were closed but were not each labeled to indicate their contents.

After passing the decommissioned boiler building, the inspection returned back into the Facility.

- I observed the induction heaters and scalpers for billets.
- The billets are fed to the extruder and pushed through a die under approximately 6600 tons of pressure.
- The caustic tank for cleaning extruder dies was in the area of the extruder. The waste generated from this tank is removed directly from the tank by the contractor and is not stored prior to removal from the site.
- I next observed the 90-day area, which did not have any containers of hazardous waste in it at the time of the inspection. One 55-gallon drum of non-combustible dust was stored in the area as was a bin labeled as "Universal Waste" containing a few lamps. Much of the remainder of the building to the south was used for warehousing or was empty space.
- I observed the rolling mill.

End of Tour

Records and Emergency Preparedness Review

Preparedness and Prevention: The Facility is equipped with internal communications and alarm systems. Phones are available for external communications to summon emergency assistance. In addition to a plant-wide fire suppression system, portable fire extinguishers and spill control equipment are located throughout the Facility and near the 90-day hazardous waste storage area. Emergency equipment is tested and maintained according to a schedule. Aisle space appeared to be adequate throughout the facility. Arrangements with local emergency authorities have been made.

Contingency Plan: The plan was last updated in November, 2015. Waste streams were discussed in the plan and consist of spent refractory, caustic waste from the bath near the extrusion press, waste paint/related materials generated in maintenance, waste from the ultrasound station (Hilti), and various chemicals from the laboratory. The plan included coordination agreements with local emergency responders, an evacuation plan with signals and routes, a list of emergency coordinators (Anthony Klapac was listed as the primary coordinator), and proof of distribution of the plan to the emergency responders.

Manifests: Three years of hazardous waste manifests were available for review. Land disposal restriction (LDR) forms were also available for review.

Training: Training records for all employees at the facility were available for review. An annual review of the RCRA-based training was last conducted in November, 2015, and was provided by an outside contractor, David Paul. Of note, the training presentation stated that recyclable secondary materials are not wastes. I stated to the Facility representatives that secondary materials that are recycled may still be wastes.

Inspections: Inspections were being conducted consistently in the 90-day hazardous waste storage area. Mr. Klapac conducts the inspections. I noted that if the refractory brick were to be stored in a roll-off box in an area away from the 90-day storage area, that this second area would be subject to all 90-day area requirements including, but not limited to, closure, emergency equipment, and inspections.

Waste Determinations: Documentation supporting waste determinations were available for review. A total halogen analysis of their used oil was provided shortly after the inspection showing a result below 1,000ppm. Dissolved air floatation sludge analysis showed that the material is non-hazardous. Refractory brick is analyzed each time it is generated from Melter 3. The waste tested hazardous in June, 2014, for lead.

Closing Conference

The following items were discussed with Kaiser personnel at the close of the inspection:

- Confidential Business Information (CBI) – It was determined that I did not collect information or photographs that were to be managed as CBI.
- Satellite accumulation requirements;
- Used oil analysis;

- Management of refractory brick;
- Regulations applicable to the frac tank; and
- Regulations applicable to the two in-ground tanks for washwater that is managed as used oil.

List of Appendices

- Appendix A: Photograph Log
- Appendix B: Checklists
- Appendix C: Documents Received During the Inspection

Appendix A

Photograph Log

Inspection Date:
August 16, 2016

Facility Name and ID Number:
Kaiser Aluminum Fabricated Products
EPA ID: OHD004298089

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Camera Used:
Olympus Stylus 600
Serial Number: A47525904

Photograph 1

Taken at 9:09 a.m. CT

Two 9,000-gallon used oil tanks at the site are insulated to prevent freezing, and were labeled as "Used Oil." The containment area around the tanks appeared to be in good condition. A truck loading pad adjacent to the containment is constructed to drain into the containment through weep holes.

Photograph 2

Taken at 9:19 a.m. CT

This in-ground sump and a second sump (not pictured) is used to collect wash waters from the utility garage and carpentry shop. The water is managed as used oil.

Photograph 3

Taken at 9:27 p.m. CT

In the maintenance department a can-puncturing device that was closed and labeled as "Hazardous Waste Paint." One additional 55-gallon drum in the area was for loose paint, such as what is left over from a paint can. This drum was also closed and labeled as "Hazardous Waste Paint." Both drums were vented through a carbon filter.

Photograph 4

Taken at 10:05 p.m. CT

I observed several roll-off boxes near the incoming metals storage area. This roll-off contained waste refractory that was not from melter 3.

Photograph 5

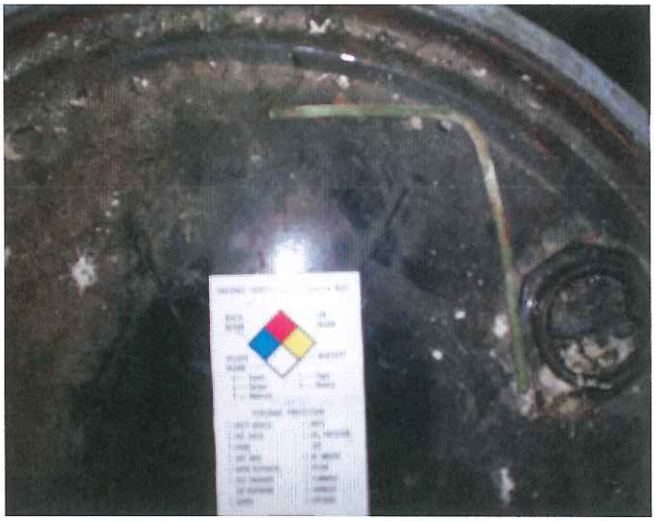
Taken at 10:17 p.m. CT

This lagoon is part of the facility cooling water system.

Photograph 6

Taken at 10:52 p.m. CT

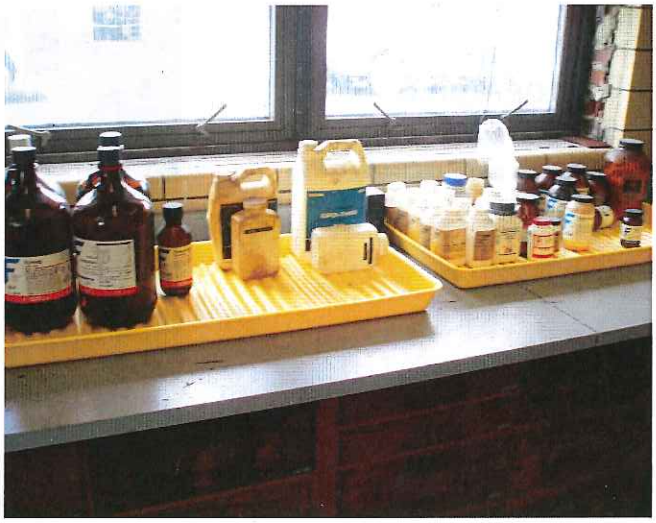
This photograph was taken in error.



Photograph 7

Taken at 11:17 p.m. CT

Containers of discarded laboratory chemicals were stored on a bench in the lab. These containers were each closed, but were not each labeled to indicate their contents.



Appendix B

Checklists

Inspection Date:
August 16, 2016

Facility Name and ID Number:
Kaiser Aluminum Fabricated Products
EPA ID: OHD004298089

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

LARGE QUANTITY GENERATOR REQUIREMENTS

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes ☒ No ☐ N/A ☐	
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes ☒ No ☐ N/A ☐	
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes ☒ No ☐ N/A ☐	
4.	Were biennial reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] (filed on even years for previous year)	Yes ☒ No ☐ N/A ☐	
5.	Are biennial reports kept on file for at least 3 years? [3745-52-40(B)]	Yes ☒ No ☐ N/A ☐	
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes ☐ No ☒ N/A ☐	
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes ☐ No ☒ N/A ☐	
8.	Does the generator accumulate hazardous waste?	Yes ☒ No ☐ N/A ☐	

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes ☐ No ☒ N/A ☐	

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☒	
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☒	
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☒	

	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☒

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes ☐ No ☐ N/A ☒	
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐ No ☐ N/A ☐	
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐ No ☐ N/A ☐	
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐ No ☐ N/A ☐	
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐ No ☐ N/A ☐	
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☐	

MANIFEST REQUIREMENTS

12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☒ No ☐ N/A ☐	
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes ☒ No ☐ N/A ☐	

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]

14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐	

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]

15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒	
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☒ No ☐ N/A ☐	

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17.	If the generator received a rejected load or residue, did the generator:		
a.	Sign item 20 of the new manifest or item 18c of the original manifest?	Yes ☐ No ☐ N/A ☒	

Kaiser Aluminum
8/16/16

		[3745-52-23(F)(1)	
	b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes ☐ No ☐ N/A ☒
	c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes ☐ No ☐ N/A ☒
18.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☒
19.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☒
20.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐

NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes ☒ No ☐ N/A ☐

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☒ No ☐ N/A ☐

25.		Does the generator provide refresher training to employees during each period from January 1st to December 31st and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes ☒ No ☐ N/A ☐
26.		Does the generator keep records and documentation of:	
	a.	Job titles? [3745-65-16(D)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule? [3745-65-16(D)(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☒ No ☐ N/A ☐
27.		Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes ☒ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes ☒ No ☐ N/A ☐
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☒ No ☐ N/A ☐
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes ☒ No ☐ N/A ☐
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☒ No ☐ N/A ☐
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes ☒ No ☐ N/A ☐

	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes ☐ No ☒ N/A ☐
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes ☒ No ☐ N/A ☐
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.		Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes ☐ No ☒ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☒
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☒
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes ☒ No ☐ N/A ☐
35.		Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
	a.	Internal communications or alarm system? [3745-65-32(A)] radio/phone/PA	Yes ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] 3rd party inspection	Yes ☒ No ☐ N/A ☐
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes ☒ No ☐ N/A ☐
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes ☒ No ☐ N/A ☐
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes ☐ No ☐ N/A ☒
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☒ No ☐ N/A ☐
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes ☒ No ☐ N/A ☐
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☐ No ☐ N/A ☒

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐

	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☒
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☒ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] LAB	Yes ☐ No ☒ N/A ☐
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☒ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] NONE OBSERVED		Yes ☐ No ☐ N/A ☒
46.	The date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container? [3745-52-34(A)(2)]		Yes ☐ No ☐ N/A ☒
47.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☐ No ☐ N/A ☒
	b.	In good condition? [3745-66-71]	Yes ☐ No ☐ N/A ☒
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☐ No ☐ N/A ☒
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☐ No ☐ N/A ☒

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]		Yes ☒ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☒ No ☐ N/A ☐
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☒ No ☐ N/A ☐
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] NOT OBSERVED		Yes ☐ No ☐ N/A ☐
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☐ No ☐ N/A ☒
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] NONE CLOSED		Yes ☐ No ☐ N/A ☒

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS ACCORDING TO FACILITY

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]		Yes ☒ No ☐ N/A ☐
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]		Yes ☒ No ☐ N/A ☐
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]		Yes ☒ No ☐ N/A ☐

GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS

GENERAL REQUIREMENTS

1.		If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes ☐ No ☐ N/A ☒
2.		Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes ☒ No ☐ N/A ☐
	a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes ☒ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).				
3.		Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes ☒ No ☐ N/A ☐
4.		Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
5.		Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes ☐ No ☒ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes ☐ No ☐ N/A ☒
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.				
6.		Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes ☒ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.				
NOTE: Written documentation of this determination is not required.				
7.		Did the generator treat his HW /soil on-site to meet the LDR treatment standard?	Yes ☐ No ☒ N/A ☐
NOTE: If "Yes" see question #16.				
8.		Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes ☐ No ☐ N/A ☒
		i Applicable HW codes?	Yes ☐ No ☐ N/A ☒
		ii Manifest number of the first shipment to the TSD?	Yes ☐ No ☐ N/A ☒
		iii A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes ☐ No ☐ N/A ☒

Every shipment – LDR

Every Load

9.		Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
10.		Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM			
11.		Does the LDR Notification form contain the following information:	
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes ☐ No ☐ N/A ☒
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)] "None"	Yes ☐ No ☐ N/A ☒
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes ☐ No ☐ N/A ☒
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
PROHIBITED DILUTION			
12.		Is the HW treated by burning? If "No" go to #15.	Yes ☒ No ☐ N/A ☐ May be (Paint waste)
13.		Is the HW a metal-bearing HW?	Yes ☐ No ☒ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.			
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)]	
		i. Contains > 1% TOC?	Yes ☐ No ☐ N/A ☒
		ii. Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☒
		iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☒

		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☒
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☒
	b.		If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes ☐ No ☐ N/A ☒
15.			Was the HW treated by wastewater treatment? Not onsite	Yes ☐ No ☐ N/A ☒
	a.		Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes ☐ No ☒ N/A ☐
NOTE: If "Yes", HW is improperly being treated by dilution.				
	b.		Does the waste carry the D001 code and contain ≥10% TOC?	Yes ☐ No ☒ N/A ☐
	c.		Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes ☐ No ☐ N/A ☒
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				
GENERATOR TREATMENT				
16.			Does the generator treat to meet LDRs on-site?	Yes ☐ No ☒ N/A ☐
			Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes ☐ No ☐ N/A ☒
			If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.	
	a.		Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes ☐ No ☐ N/A ☒
	b.		Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☒
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.				
	c.		Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☒
	d.		Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☒
	e.		Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes ☐ No ☐ N/A ☒
	f.		Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes ☐ No ☐ N/A ☒
NOTIFICATION FORM FOR GENERATOR TREATMENT				
17.	a.		Contains all information in #11 a-g above and	Yes ☐ No ☐ N/A ☒

	b.		If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes ☐ No ☐ N/A ☒
	c.		If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
		i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes ☐ No ☐ N/A ☒
		ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes ☐ No ☐ N/A ☐
		iii.	Include in the notification: [3745-270-09(D)]	
			1. Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☐
			2. Description of HW when generated?	Yes ☐ No ☐ N/A ☐
			3. HW code when generated?	Yes ☐ No ☐ N/A ☐
			4. Treatability group when generated?	Yes ☐ No ☐ N/A ☐
			5. Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☐
		iv.	Contain the certification statement as required by 3745-270-07(B)(4)?	Yes ☐ No ☐ N/A ☐

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes ☐ No ☒ N/A ☐	
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes ☐ No ☒ N/A ☐	
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES		NONE OBSERVED	
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes ☐ No ☐ N/A ☐	
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes ☐ No ☐ N/A ☐	
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes ☐ No ☐ N/A ☐	
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes ☐ No ☐ N/A ☐	
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☐	
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☐ No ☐ N/A ☐	
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]	Yes ☐ No ☐ N/A ☐	
UNIVERSAL WASTE PESTICIDES			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes ☐ No ☐ N/A ☒	
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes ☐ No ☐ N/A ☐	
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes ☐ No ☐ N/A ☐	
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes ☐ No ☐ N/A ☐	
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-14(B)(1)&(2)]	Yes ☐ No ☐ N/A ☐	

13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-14(C)(1)&(2)]	Yes ☐ No ☐ N/A ☒	
UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT			
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes ☐ No ☐ N/A ☒	
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]		
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes ☐ No ☐ N/A ☒	
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes ☐ No ☐ N/A ☐	
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes ☐ No ☐ N/A ☐	
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes ☐ No ☐ N/A ☐	
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes ☐ No ☐ N/A ☐	
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes ☐ No ☐ N/A ☐	
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	Yes ☐ No ☐ N/A ☐	
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes ☐ No ☐ N/A ☐	
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes ☐ No ☐ N/A ☐	
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes ☐ No ☐ N/A ☐	

	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes ☐ No ☐ N/A ☒
18.		Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes ☐ No ☐ N/A ☐
19.		Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14(D)(2)]	Yes ☐ No ☐ N/A ☐
UNIVERSAL WASTE LAMPS			
20.		Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes ☒ No ☐ N/A ☐
21.		Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes ☐ No ☐ N/A ☒
*NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*			
22.		Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]	Yes ☒ No ☐ N/A ☐
ACCUMULATION TIME			
23.		Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes ☒ No ☐ N/A ☐
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☐ No ☐ N/A ☒
NOTE: Accumulation is defined as date generated or date received from another handler.			
24.		Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Shipping records	Yes ☒ No ☐ N/A ☐

EMPLOYEE TRAINING			
25.		Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES			
26.		Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes ☐ No ☐ N/A ☒
27.		Is the material released characterized? [3745-273-17(B)]	Yes ☐ No ☐ N/A ☒
28.		If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes ☐ No ☐ N/A ☒
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.			
29.		Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes ☒ No ☐ N/A ☐
30.		Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes ☒ No ☐ N/A ☐
31.		Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes ☒ No ☐ N/A ☐
32.		Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes ☐ No ☐ N/A ☒
33.		If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:	Yes ☐ No ☐ N/A ☒
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes ☐ No ☐ N/A ☒
34.		If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes ☐ No ☐ N/A ☒
EXPORTS			
NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]			
NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.			

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.
2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☒
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes ☐ No ☐ N/A ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☒ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes ☒ No ☐ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]		Yes ☒ No ☐ N/A ☐

9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☐ No ☐ N/A ☒
	a.	Stopped the release?	Yes ☐ No ☐ N/A ☐
	b.	Contained the release?	Yes ☐ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☐ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☐ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☒
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☐
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☐
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☒ No ☐ N/A ☐
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes ☐ No ☐ N/A ☒
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☒
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes ☐ No ☐ N/A ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

Appendix C

Documents received during the Inspection:

- Site Map

Inspection Date:
August 16, 2016

Facility Name and ID Number:
Kaiser Aluminum Fabricated Products
EPA ID: OHD004298089

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

TOUR MAP

KAISER ALUMINUM ENGINEERED PRODUCTS Best in Class